

Exhibit A



**Service of Process
Transmittal**

12/30/2021

CT Log Number 540815437

TO: Greg Stevens
Radius Global Solutions LLC
9550 REGENCY SQUARE BLVD STE 500
JACKSONVILLE, FL 32225-8169

RE: Process Served in Alabama

FOR: Radius Global Solutions LLC (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: ROBERT W CHILDREE an individual, vs. RADIUS GLOBAL SOLUTIONS LLC

DOCUMENT(S) SERVED: --

COURT/AGENCY: None Specified
Case # 01DV202190573300

ON WHOM PROCESS WAS SERVED: C T Corporation System, Montgomery, AL

DATE AND HOUR OF SERVICE: By Certified Mail on 12/30/2021 postmarked: "Not Post Marked"

JURISDICTION SERVED : Alabama

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT will retain the current log

Image SOP

Email Notification, Greg Stevens greg.stevens@radiusgs.com

Email Notification, Valerie Bartosh valerie.bartosh@radiusgs.com

Email Notification, Martha Bradley martha.bradley@radiusgs.com

Email Notification, Renee Bogar renee.bogar@radiusgs.com

Email Notification, Lori Schmitt lschmitt@sessions.legal

Email Notification, Diana Orellana dorellana@sessions.legal

Email Notification, Donielle Lambert dlambert@sessions.legal

REGISTERED AGENT ADDRESS: C T Corporation System
2 North Jackson Street
Suite 605
Montgomery, AL 36104
877-467-3525
SmallBusinessTeam@wolterskluwer.com



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The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



Case 2:22-cv-00138-SGC Document 1-1 Filed 02/02/22 Page 4 of 18

JACQUELINE ANDERSON SMITH, CLERK
DISTRICT COURT of JEFFERSON COUNTY
CIVIL DIVISION - ROOM 500
716 RICHARD ARRINGTON JR. BLVD. NORTH
BIRMINGHAM, ALABAMA 35203



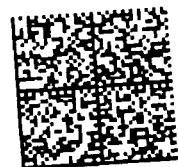
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US POSTAGE[®] PITNEY BOWES



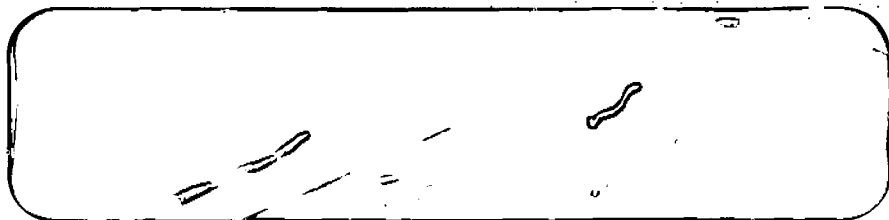
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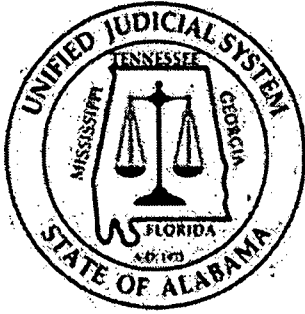


US POSTAGE[®] PITNEY BOWES



ZIP 35203 \$ 013.00
02 4W
0000374811 DEC 28 202





AlaFile E-Notice

01-DV-2021-905733.00

To: RADIUS GLOBAL SOLUTIONS LLC
CT CORPORATION SYSTEM
2 N JACKSON ST STE 605
MONTGOMERY, AL, 36104

NOTICE OF ELECTRONIC FILING

IN THE DISTRICT COURT OF JEFFERSON COUNTY, ALABAMA

ROBERT W CHILDREE V. RADIUS GLOBAL SOLUTIONS LLC
01-DV-2021-905733.00

The following complaint was FILED on 12/21/2021 9:31:04 AM

Notice Date: 12/21/2021 9:31:04 AM

JACQUELINE ANDERSON SMITH
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD. ROOM 500
BIRMINGHAM, AL, 35203

205-325-5331
jackie.smith@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 01-DV-2021-905733.00
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IN THE DISTRICT COURT OF JEFFERSON COUNTY, ALABAMA
ROBERT W CHILDREE V. RADIUS GLOBAL SOLUTIONS LLC

NOTICE TO: RADIUS GLOBAL SOLUTIONS LLC, CT CORPORATION SYSTEM 2 N JACKSON ST STE 605, MONTGOMERY, AL 36104

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S).
 JOHN GRIFFIN WATTS

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: 301 19th Street North, BIRMINGHAM, AL 35203

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 14 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of ROBERT W CHILDREE
 pursuant to the Alabama Rules of the Civil Procedure. *(Name(s))*

12/21/2021 /s/ JACQUELINE ANDERSON SMITH By: _____
(Date) *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ JOHN GRIFFIN WATTS
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) *(Name of County)*

Alabama on _____
(Date)

(Type of Process Server)

(Server's Signature)

(Address of Server)

(Server's Printed Name)


(Phone Number of Server)

01-DV-2021-905733.00
ROBERT W CHILDREE V. RADIUS GLOBAL SOLUTIONS LLC

C001 - ROBERT W CHILDREE
(Plaintiff)

v.

D001 - RADIUS GLOBAL SOLUTIONS LLC
(Defendant)



SERVICE RETURN COPY

DOCUMENT 4

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 01-DV-2021-905733.00
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IN THE DISTRICT COURT OF JEFFERSON COUNTY, ALABAMA
ROBERT W CHILDREE V. RADIUS GLOBAL SOLUTIONS LLC

NOTICE TO: RADIUS GLOBAL SOLUTIONS LLC, CT CORPORATION SYSTEM 2 N JACKSON ST STE 605, MONTGOMERY, AL 36104

(Name and Address of Defendant)

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JOHN GRIFFIN WATTS

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: 301 19th Street North, BIRMINGHAM, AL 35203

(Address(es) of Plaintiff(s) or Attorney(s))

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12/21/2021 /s/ JACQUELINE ANDERSON SMITH By: _____
 (Date) (Signature of Clerk) (Name)

☒ Certified Mail is hereby requested. /s/ JOHN GRIFFIN WATTS
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
County,

_____ in _____
 (Name of Person Served) (Name of County)

Alabama on _____
(Date)

 (Type of Process Server)

 (Server's Signature)

 (Address of Server)

 (Server's Printed Name)

 (Phone Number of Server)

DOCUMENT



ELECTRONICALLY FILED
12/21/2021 9:30 AM
01-DV-2021-905733.00
DISTRICT COURT OF
JEFFERSON COUNTY, ALABAMA
JACQUELINE ANDERSON SMITH, CLERK

State of Alabama
Unified Judicial System

Form ARCiv-93 Rev.5/99

COVER SHEET
DISTRICT COURT - CIVIL CASE
(Not For Domestic Relations Cases)

Case
0

Date of Filing:
12/21/2021

Judge Code:

GENERAL INFORMATION

IN THE DISTRICT COURT OF JEFFERSON COUNTY, ALABAMA
ROBERT W CHILDREE v. RADIUS GLOBAL SOLUTIONS LLC

First Plaintiff: ☐ Business ☒ Individual **First Defendant:** ☒ Business ☐ Individual
☐ Government ☐ Other ☐ Government ☐ Other

NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:

- ☐ CTEM-Contempt of Court
☐ CONT-Contract/Ejectment/Writ of Seizure
☐ AUTO-Autodamages/Subrogation/Promissory Note
☐ DISP-Non-Account Dispute: Roommate/Neighbor/Animal
☐ EVIC-Eviction
☒ GDAM-General Damages
☐ ABAN - Abandoned Automobile
☐ ACCT - Account & Nonmortgage
☐ RECP-Recover Property
☐ DVXX-Miscellaneous District Civil Case
☐ TOXX - Other: _____

ORIGIN: F ☒ INITIAL FILING

O ☐ OTHER

R ☐ REMANDED

RELIEF REQUESTED: ☒ MONETARY AWARD REQUESTED ☐ NO MONETARY AWARD REQUESTED

ATTORNEY CODE:

WAT056

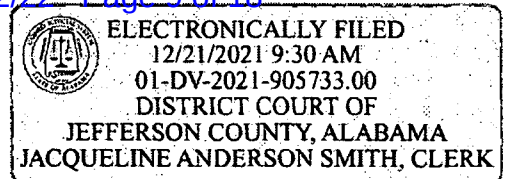
12/21/2021 9:30:59 AM

Date

/s/ JOHN GRIFFIN WATTS

Signature of Attorney/Party filing this form

MEDIATION REQUESTED: ☐ YES ☒ NO ☐ UNDECIDED



IN THE DISTRICT COURT OF JEFFERSON COUNTY, ALABAMA

ROBERT W. CHILDREE,)
an individual,)

Plaintiff,)

v.)

Civil Action No.:

RADIUS GLOBAL SOLUTIONS)
LLC,; Fictitious Defendants)
“A”, “B” and “C” thereby)
intending to refer to the legal entity,)
person, firm or corporation)
which was responsible)
for or conducted the wrongful acts)
alleged in the Complaint; Names of)
the Fictitious parties are unknown)
to the Plaintiff at this time but will)
be added by amendment when)
ascertained)
Defendants.)

COMPLAINT

COMES NOW the Plaintiff, by and through counsel, in the above styled cause, and for Plaintiff's Complaint against the Defendant¹ states as follows:

1. This action arises out of Defendant's repeated violations of the Fair Debt Collection Practices Act², 15 U.S.C. § 1692 et seq. ("FDCPA") and out state

¹ "Defendant" means all defendants, including fictitiously named defendants.

² Any reference the FDCPA or any part thereof encompasses all relevant parts and subparts of each statute.

law violations by the Defendant and its agents in their illegal efforts to collect a consumer debt from Plaintiff.

PARTIES

2. Plaintiff **Robert W. Childree** (hereinafter “Plaintiff”) is a natural person who is a resident of Alabama.
3. Defendant **Radius Global Solutions LLC**, is a debt collection firm that engages in the business of debt collection. Its principal business purpose is the collection of debts, and it uses various instruments of interstate commerce to accomplish debt collection including sending letters, calling on the phone, credit reporting, filing of lawsuits, etc.
4. Fictitious Defendants “A”, “B” and “C” thereby intending to refer to the legal entity, person, firm or corporation which was responsible for or conducted the wrongful acts alleged in the Complaint; names of the Fictitious parties are unknown to the Plaintiff at this time but will be added by amendment when ascertained.
5. Any reference to any **Defendant** refers to all Defendants and Fictitious Defendants.

JURISDICTION

6. Personal jurisdiction exists over **Defendant** as **Defendant** has the necessary minimum contacts with the State of Alabama and this suit arises out of

Defendant's specific conduct with Plaintiff in Alabama. All the actions described in this suit occurred in Alabama.

VENUE

7. Venue is proper as **Defendant** does business in this judicial district.

FACTUAL ALLEGATIONS

8. Congress found it necessary to pass the FDCPA due to rampant abusive practices by dishonorable debt collectors. 15 USC § 1692 is entitled "Congressional findings and declaration of purpose" and it states as follows:

- (a) There is **abundant evidence** of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors. **Abusive debt collection practices contribute** to the number of personal bankruptcies, to marital instability, to the loss of jobs, and **to invasions of individual privacy**.
- (b) Existing laws and procedures for redressing these injuries are inadequate to protect consumers.
- (c) **Means other than** misrepresentation or other **abusive debt collection practices are available for the effective collection of debts**.
- (d) Abusive debt collection practices are carried on to a substantial extent in interstate commerce and through means and instrumentalities of such commerce. Even where abusive debt collection practices are purely intrastate in character, they nevertheless directly affect interstate commerce.
- (e) It is the **purpose** of this title to **eliminate abusive debt collection practices** by debt collectors, to **insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged**, and to promote consistent State action to protect consumers against debt collection abuses.

[Emphasis added].

9. Plaintiff allegedly incurred a financial obligation that was primarily for personal, family or household purposes and is therefore a “debt” as that term is defined by 15 U.S.C. § 1692a(5).
10. **Defendant** is considered a “debt collector” and began engaging in debt collection activities against Plaintiff.
11. The primary and principal business of **Defendant** is to collect alleged defaulted debts.
12. **Defendant** claimed Plaintiff owed **Defendant** money.
13. The alleged debt was in default at the first moment **Defendant** received the debt for collection purposes.
14. **Defendant** made a third-party disclosure to one or more companies about Plaintiff and the debt in violation of the FDCPA.
15. This was done, at least in part, by **Defendant** using a third-party mailing vendor without the permission of Plaintiff, to send a letter dated **February 3, 2021**.
16. This is illegal under the FDCPA and state law. See, for example, 15 U.S.C. Section 1692c(b) which states, “Except as provided in section 1692b of this title, without the prior consent of the consumer given directly to the debt collector, or the express permission of a court of competent jurisdiction, or as reasonably necessary to effectuate a postjudgment judicial

remedy, a debt collector may not communicate, in connection with the collection of any debt, with any person other than the consumer, his attorney, a consumer reporting agency if otherwise permitted by law, the creditor, the attorney of the creditor, or the attorney of the debt collector.”

17. **Defendant** does not satisfy any exception or exemption to this law.
18. The third-party disclosure was a communication under the FDCPA related to a consumer debt.
19. **Defendant** had no permission or authorization to disclose any details of Plaintiff's debt to anyone other than Plaintiff, spouse of Plaintiff, or a consumer reporting agency.
20. All of the above-described actions by **Defendant** and collection agents of **Defendant** were made in violation of the FDCPA.
21. The above-detailed conduct by this **Defendant** of harassing Plaintiff in an effort to continue to collect this debt was also an invasion of Plaintiff's privacy by an intrusion upon seclusion and resulted in actual damages to the Plaintiff.
22. **Defendant's** repeated attempts to collect this debt from Plaintiff and refusal to stop violating the law created an invasion of Plaintiff's privacy and Plaintiff's right to be left alone.
23. The conduct of the **Defendant** has proximately caused Plaintiff damages.

NEGLIGENT AND WANTON HIRING AND SUPERVISION

24. **Defendant** negligently and/or wantonly hired, retained, or supervised incompetent debt collectors and are thereby responsible to the Plaintiff for the wrongs committed against Plaintiff and the damages suffered by Plaintiff.

CAUSES OF ACTION

COUNT I.

**VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692 et seq.**

25. The acts and omissions of **Defendant** and its agents constitute numerous and multiple violations of the FDCPA with respect to the Plaintiff, including, but not limited to, violations of 1692c, 1692c(b), 1692d, 1692e, 1692e(10), 1692f and 1692f(1).
26. As a result of **Defendant's** violations of the FDCPA, Plaintiff is entitled to actual damages, statutory damages and reasonable attorney's fees and costs from **Defendant**.

COUNT II.

INVASION OF PRIVACY

27. Alabama law recognizes Plaintiff's right to be free from invasions of privacy and **Defendant** violated Alabama state law as described in this Complaint.

28. Congress explicitly recognized a consumer's inherent right to privacy in collection matters in passing the Fair Debt Collection Practices Act, when it stated as part of its findings:

Abusive debt collection practices contribute to the number of personal bankruptcies, to marital instability, to the loss of jobs, and **to invasions of individual privacy**.

15 U.S.C. § 1692(a) (emphasis added).

29. Congress further recognized a consumer's right to privacy in financial data in passing the Gramm Leech Bliley Act, which regulates the privacy of consumer financial data for a broad range of "financial institutions" including debt collectors (albeit without a private right of action), when it stated as part of its purposes:

It is the policy of the Congress that **each financial institution has an affirmative and continuing obligation to respect the privacy of its customers** and to protect the security and confidentiality of those customers' nonpublic personal information.

15 U.S.C. § 6801(a) (emphasis added).

30. **Defendant** and/or its agents intentionally, recklessly, and/or negligently interfered, physically or otherwise, with the solitude, seclusion and or private concerns or affairs of the Plaintiff, namely, by repeatedly and unlawfully attempting to collect a debt and thereby invaded Plaintiff's privacy.

31. **Defendant** and its agents intentionally, recklessly, and/or negligently caused emotional harm to Plaintiff by engaging in highly offensive conduct in the course of collecting this debt, thereby invading and intruding upon Plaintiff's right to privacy.
32. Plaintiff had a reasonable expectation of privacy in Plaintiff's solitude, seclusion, private concerns or affairs, and private financial information.
33. The conduct of this **Defendant** and its agents, in engaging in the above-described illegal collection conduct against Plaintiff, resulted in multiple intrusions and invasions of privacy by this **Defendant** which occurred in a way that would be highly offensive to a reasonable person in that position.
34. As a result of such intrusions and invasions of privacy, Plaintiff is entitled to actual damages in an amount to be determined at trial from **Defendant**.
35. All acts of **Defendant** and its agents and/or employees were committed with malice, intent, wantonness, and/or recklessness and as such **Defendant** is subject to punitive damages.

COUNT III.

NEGLIGENT, WANTON, AND/OR INTENTIONAL HIRING AND SUPERVISION OF INCOMPETENT DEBT COLLECTORS

36. **Defendant** negligently, wantonly, and/or intentionally hired, retained, or supervised incompetent debt collectors, who were allowed or encouraged to violate the law as was done to Plaintiff, and are thereby responsible to the

Plaintiff for the wrongs committed against Plaintiff and the damages suffered by Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that judgment be entered against Defendant for all damages allowable, costs, expenses, attorney fees, injunctive relief to prevent further violations, and for such other and further relief as may be just and proper.

Respectfully Submitted,

/s/ John G. Watts

John G. Watts (WAT056)

M. Stan Herring (HER037)

Watts & Herring, LLC

The Kress Building

301 19th Street North

Birmingham, Alabama 35203

(205) 879-2447

(888) 522-7167 *facsimile*

john@wattsherring.com

stan@wattsherring.com

Attorneys for Plaintiff

Serve defendant via certified mail at the following address:

Radius Global Solutions LLC
c/o CT CORPORATION SYSTEM
2 NORTH JACKSON ST STE 605
MONTGOMERY, AL 36104